

Marsha A. Houston (SBN 129956)  
Christopher O. Rivas (SBN 238765)  
REED SMITH LLP  
355 South Grand Avenue, Suite 3900  
Los Angeles, CA 90071-1514  
Telephone: 213.457.8000  
Facsimile: 213.457.8080

Attorneys for Creditor  
AECOM Technical Services, Inc.

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA

**In re:**

Bankruptcy Case No. 19-30088 (DM)

**PG&E CORPORATION**

- and -

Chapter 11

# PACIFIC GAS AND ELECTRIC COMPANY.

(Lead Case)

### **Debtors.**

**NOTICE OF CONTINUED  
PERFECTION OF LIEN PURSUANT  
TO 11 U.S.C. § 546(b)(2)**

Affects PG&E Corporation

Affects Pacific Gas and Electric Company

[Lake County; Rec. No. 2019000837]

Affects both Debtors

\* All papers shall be filed in the Lead Case, No. 19-30088 (DM).

Defendant AECOM Technical Services, Inc. ("AECOM"), through its undersigned counsel, hereby provides notice of continued perfection of its mechanics lien under Section 546(b)(2) of Title 11 of the United States Code (the "Bankruptcy Code"), as follows:

1. AECOM has provided and delivered labor, services, equipment, and/or materials for the construction and improvement of projects on real property located in the County of Lake, State of California (the "Property"), the legal description for which is set forth in the Claim of Mechanics Lien, a true copy of which is attached hereto as **Exhibit A** (the "Mechanics Lien"), which Mechanic's Lien was assigned File No. 2019000837.

2. The Property is owned by Pacific Gas and Electric Company (the "Debtor"), which filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code on January 29, 2019 (the "Petition Date").

3. On January 28, 2019, before the Petition Date, AECOM properly perfected its Mechanics Lien under California Civil Code § 8400, et seq. by timely recording it in the Official Records of Lake County, State of California.

4. Through January 21, 2019, the amount owing to AECOM subject to its Mechanics Lien is at least \$9,097.35, exclusive of accruing interest and other charges, and additional amounts which have continued, and are continuing, to accrue after the Petition Date.

5. Under California Civil Code § 8412:

A direct contractor may not enforce a lien unless the contractor records a claim of lien after the contractor completes the direct contract, and before the earlier of the following times:

(a) Ninety days after completion of the work of improvement.

(b) Sixty days after the owner records a notice of completion or cessation.

In turn, California Civil Code §8460(a) provides that:

The claimant shall commence an action to enforce a lien within 90 days after recordation of the claim of lien. If the claimant does not commence an action to enforce the lien within that time, the claim of lien expires and is unenforceable

6. Pursuant to California Civil Code § 8460, an action to enforce a lien must be commenced within 90 days after recordation of the claim of lien. However, Bankruptcy Code

section 362 automatically stays AECOM from filing a state court action to enforce its mechanics lien.

7. Bankruptcy Code section 546(b)(2) provides that when applicable law

. . . requires seizure of such property or commencement of an action to accomplish such perfection, or maintenance or continuation of perfection of an interest in property; and . . . such property has not been seized or such an action has not been commenced before the date of the filing of the petition; such interest in such property shall be perfected, or perfection of such interest shall be maintained or continued, by giving notice within the time fixed by such law for such seizure or such commencement.

8. Pursuant to Bankruptcy Code section 546(b), AECOM hereby files this notice in lieu of the commencement of any such action to perfect, maintain, or continue its Mechanics Lien. AECOM hereby provides notice of its rights as a perfected lienholder in the Property pursuant to California's mechanics lien law. AECOM asserts a secured interest in the Property to the fullest extent allowable by applicable law, including interest and attorney's fees.

9. This Notice shall not be construed as an admission that such filing is required or to the necessity of recording, commencement, or seizure. Additionally, AECOM hereby gives notice that it has, or may be entitled to, additional mechanics' liens rights to properties owned by the Debtor as they become due and owing according to prepetition contracts with the Debtor for the improvement of real property. This Notice shall preserve and continue to preserve any and all of AECOM's rights as to the Bankruptcy Code and the California Civil Code.

AECOM expressly reserves its rights to seek relief from the automatic stay to foreclose its mechanics lien and/or a waiver of any other rights or defenses. AECOM further reserves all rights, including the right to amend or supplement this notice.

23 DATED: April 24, 2019 Reed Smith LLP

/s/ Marsha A. Houston  
Marsha A. Houston  
Christopher O. Rives

Attorneys for Creditor  
AECOM Technical Services, Inc.

## **Exhibit A**



RECORDING REQUESTED BY

NAME: Luke N. Eaton, Esq.

WHEN RECORDED MAIL TO:

NAME: PEPPER HAMILTON LLP

ADDRESS: 350 S. Grand Avenue, Suite 3400

CITY / STATE / ZIP: Los Angeles, CA 90071

(DOCUMENT WILL ONLY BE RETURNED TO NAME & ADDRESS IDENTIFIED ABOVE)

Doc # 2019000837

Page 1 of 4

Date: 1/28/2019 01:59P

Filed by: PUBLIC

Filed & Recorded in Official Records

of COUNTY OF LAKE

RICHARD A. FORD

COUNTY RECORDER

Fee: \$98.00

(SPACE ABOVE FOR RECORDER'S USE)

**COPY** of Document Recorded  
has not been compared with original.  
Richard Ford-Lake County Assessor-Recorder

MECHANICS LIEN

(DOCUMENT TITLE)

SEPARATE PAGE, PURSUANT TO CA. GOV'T. CODE 27361.6

**RECORDING REQUESTED BY AND  
WHEN RECORDED MAIL TO:**

Luke N. Eaton, Esq.
Name
c/o Pepper Hamilton LLP
350 South Grand Avenue, Suite 3400
Two California Plaza
Address
Los Angeles, CA 90071-3427
City & State

Space above this line for recorder's use only  
(To be recorded in the county recorder's office in the county  
in which the work of improvement is located.)

## **MECHANICS LIEN**

NOTICE IS HEREBY GIVEN that the undersigned claimant AECOM Technical Services, Inc. ("Claimant"), with an address at 300 South Grand Avenue, Suite 1100, Los Angeles, California 90071, claims a Mechanics Lien against Pacific Gas and Electric Company and PG&E Corporation ("PG&E") (Name(s) of Owner(s)/Reputed Owner(s)) or Tenant(s)/Reputed Tenants)

and upon every estate or interest, including leasehold interests, of PG&E in all structures, fixtures, appurtenances and improvements situated along or within the bounds of Gifford Springs Road, Oak Street, Maple Street, Hill Court, Fir Street, Pine Summit Drive, Mapes Pass and Greenway Court in Middletown, California 95461 – Lake County (Description)

(Legal Description, if available)

The lien is claimed for labor, services, equipment, materials or work ("Work") of the following kind:  
program, project and construction management services and related labor for wildfire mitigation and hardening of electrical distribution power lines and circuits, replacement of existing poles and installation of new poles. Claimant is owed \$9,097.35 for the Work, after deducting all just credits and offsets, plus interest at the legal rate from 01/21/2019.

The name of the person or company by whom Claimant was employed, or to whom Claimant furnished the work, is Pacific Gas and Electric Company.

Date: January 28, 2019

AECOM Technical Services, Inc.

(Name of Claimant)

By:

  
(Signature)

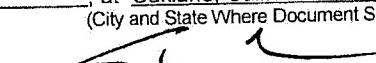
Steve Leach, Authorized Agent  
(Print Name & Authorized Capacity)

### **VERIFICATION**

I, the undersigned, say: I am the Authorized Agent  
("President Of," "Manager Of," "A Partner Of," "Owner Of," "Agent Of," Etc.)

for the Claimant named in the foregoing claim of mechanics lien; I am authorized to make this verification for the Claimant; I have read the foregoing claim of mechanics lien and know the contents thereof, and the same is true of my knowledge, information and/or belief. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on January 28, 2019, at Oakland, California  
(Date this Document was Signed) (City and State Where Document Signed)

  
(Signature) Steve Leach

**NOTICE OF MECHANICS LIEN**

**ATTENTION!**

(Civil Code § 8416)

Upon the recording of the enclosed MECHANICS LIEN with the county recorder's office of the county where the property is located, your property is subject to the filing of a legal action seeking a court-ordered foreclosure sale of the real property on which the lien has been recorded. That legal action must be filed with the court no later than 90 days after the date the mechanics lien is recorded.

The party identified in the enclosed mechanics lien may have provided labor or materials for improvements to your property and may not have been paid for these items. You are receiving this notice because it is a required step in filing a mechanics lien foreclosure action against your property. The foreclosure action will seek a sale of your property in order to pay for unpaid labor, materials, or improvements provided to your property. This may affect your ability to borrow against, refinance, or sell the property until the mechanics lien is released.

BECAUSE THE LIEN AFFECTS YOUR PROPERTY, YOU MAY WISH TO SPEAK WITH YOUR CONTRACTOR IMMEDIATELY, OR CONTACT AN ATTORNEY, OR FOR MORE INFORMATION ON MECHANICS LIENS GO TO THE CONTRACTORS' STATE LICENSE BOARD WEBSITE AT [www.cslb.ca.gov](http://www.cslb.ca.gov).

Note: Claimant must serve this Notice of Mechanics Lien, together with a copy of Claimant's Mechanics Lien, in accordance with the provisions of Civil Code § 8106 and must complete a Proof of Service Affidavit in accordance with Civil Code § 8416. The Mechanics Lien, Notice of Mechanics Lien and the Proof of Service Affidavit should all be submitted to the County Recorder for recording at one time.

**PROOF OF SERVICE AFFIDAVIT**

(California Civil Code § 8416)

**AFFIDAVIT FOR SERVICE ON THE OWNER/TENANT**

(California Civil Code §§ 8416 (a)(7) and (c)(1))

I, STEVEN R. PETTO, declare that I served a copy of this Mechanics Lien and Notice of Mechanics Lien by registered mail, certified mail, or first-class mail, evidenced by a certificate of mailing, postage prepaid, addressed as follows to the owner(s) or reputed owner(s) of the property:

Company/Person served: Pacific Gas and Electric Company,

Title or capacity of person or entity served: Owner or Reputed Owner.

Service Address: 77 Beale Street, San Francisco, California 94105.

Said service address is the owner's residence, place of business, or address shown by the building permit on file with the permitting authority for the work or the address identified on the construction trust deed.

Executed on January 28, 2019, at Oakland, California.

By: Steven R. Petto  
(Signature of Person Serving)

**AFFIDAVIT FOR SERVICE ON THE OWNER/TENANT**

(California Civil Code §§ 8416 (a)(7) and (c)(1))

I, STEVEN R. PETTO, declare that I served a copy of this Mechanics Lien and Notice of Mechanics Lien by registered mail, certified mail, or first-class mail, evidenced by a certificate of mailing, postage prepaid, addressed as follows to the owner(s) or reputed owner(s) of the property:

Company/Person served: PG&E Corporation,

Title or capacity of person or entity served: Owner or Reputed Owner.

Service Address: 77 Beale Street, San Francisco, California 94105.

Said service address is the owner's residence, place of business, or address shown by the building permit on file with the permitting authority for the work or the address identified on the construction trust deed.

Executed on January 28, 2019, at Oakland, California.

By: Steven R. Petto  
(Signature of Person Serving)

Receipt: 201901000754

LAKE COUNTY RECORDER

Teller: JLH Station: 001 Drawer: 001  
Date: 1/28/2019 2:08:26 PM

PUBLIC

2019000037	4	\$ 23.00
MECH LIEN		
STATE SENATE BILL 2		\$ 75.00
Amount Due		\$ 98.00
Amount Received		\$ 98.00
CHECK		
CHECK # 102827		
Change		\$ 0.00
Balance Due		\$ 0.00

## CERTIFICATE OF SERVICE

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is REED SMITH LLP, 355 South Grand Avenue, Suite 2900, Los Angeles, CA 90071-1514. On April 25, 2019, I served the following document(s) by the method indicated below:

**NOTICE OF CONTINUED PERFECTION OF LIEN PURSUANT  
TO 11 U.S.C. § 546(B)(2)**

- by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Los Angeles, California addressed as set forth below. I am readily familiar with the firm's practice of collection and processing of correspondence for mailing. Under that practice, it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if the postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in this Declaration.

Stephen Karotkin  
Jessica Liou  
Matthew Goren  
Weil, Gotshal & Manges LLP  
767 Fifth Avenue  
New York, NY 10153

Pacific Gas and Electric Company  
77 Beale Street  
San Francisco California 94177

*Debtor*

Tobias S. Keller  
Keller & Benvenutti LLP  
650 California Street, Suite 1900  
San Francisco, CA 94108

*Attorneys for Debtor*

I declare under penalty of perjury under the laws of the United States that the above is true and correct. Executed on April 25, 2019, at Los Angeles, California.

/S/ Gilda S. Anderson  
Gilda S. Anderson